



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

January 8, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.in.gov/idem](http://www.in.gov/idem)

TO: Interested Parties / Applicant

RE: Midwest Sheets, Incorporated / 159-16831-00016

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FN-REGIS.dot 9/16/03

January 8, 2004

Mr. Gary Schmidt  
Midwest Sheets, Incorporated  
815 Industrial Drive, P.O. Box 266  
Tipton, Indiana 46072

RE: Registered Construction and Operation Status,  
159-16831-00016

Dear Mr. Schmidt:

The application from Midwest Sheets, Incorporated, received on November 22, 2002, has been reviewed. Based on the data submitted and the provisions in Sections 1 and 2 of 326 IAC 2-5.5, it has been determined that the following, to be located at 815 Industrial Drive, Tipton, Indiana, is classified as registered:

One (1) corrugated sheet manufacturing operation consisting of the following emission units:

- (a) One (1) 20 MMBtu/hr natural gas fired boiler, with emissions exhausted through Stack S-1, and
- (b) Twenty (20) 0.6 MMBtu/hr natural gas fired space heaters.

The following conditions shall be applicable:

- (1) 326 IAC 5-1-2 (Opacity Limitations):

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

- (2) 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating):

Pursuant to 326 IAC 6-2-4 particulate matter (PM) emissions from the 20 MMBtu/hr boiler shall be limited to 0.50 lb/MMBtu.

- (3) 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

Pursuant to 40 CFR 60.48c, the owner or operator shall:

- (a) record and maintain daily records of the amount of fuel combusted in the twenty (20) MMBtu/hr natural gas fired boiler, and
- (b) report the following for the boiler at the appropriate times:

- (1) the date of commencement of construction (no later 30 days after such date);
- (2) the anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- (3) the actual start-up date (within 15 days after such date); and
- (4) the date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Said reports shall be sent to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

This registration is the revised source registration required pursuant to 325 IAC 2-5.5-2. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an:

- (1) annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5 using the Annual Notification Form located at the end of this registration, or its equivalent, and
- (2) annual boiler certification using the Natural Gas Fired Boiler Certification Form located at the end of this registration, or its equivalent.

The annual notice shall be submitted no later than March 1 of each year. The natural gas fired boiler certification shall be submitted no later than July 1 of each year.

Said reports shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

SDF

cc: File - Tipton County  
Tipton County Health Department  
Air Compliance - Marc Goldman  
Permit Tracking  
Technical Support and Modeling - Michele Boner  
Compliance Data Section - Karen Nowak

## Registration

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3).

<b>Company Name:</b>	<b>Midwest Sheets, Incorporated</b>
<b>Address:</b>	<b>815 Industrial Drive</b>
<b>City:</b>	<b>Tipton, Indiana 46072</b>
<b>Authorized individual:</b>	<b>Gary Schmidt</b>
<b>Phone #:</b>	<b>(765) 675-5678</b>
<b>Registration #:</b>	<b>159-16831-00016</b>

I hereby certify that Midwest Sheets is still in operation and is in compliance with the requirements of Registration 159-16831-00016.

<b>Name (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

## NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Midwest Sheets, Inc.  
Source Address: 815 Industrial Drive, Tipton, Indiana 46072  
Mailing Address: P.O. Box 266, Tipton, Indiana 46072  
Registration No.: 159-16831-00016

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Reporting Period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler Affected:  
Fuel

Alternative Fuel:

Days Burning Alternate

From: \_\_\_\_\_ To: \_\_\_\_\_

[illegible]

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Registration**

#### **Source Background and Description**

Source Name:	Midwest Sheets, Incorporated
Source Location:	815 Industrial Drive, Tipton, Indiana 46072
County:	Tipton
SIC Code:	2653
Registration No.:	159-16831-00016
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed a Registration application from Midwest Sheets, Incorporated relating to the operation of their existing corrugated sheet manufacturing operation.

#### **Request**

On November 22, 2002, Midwest Sheets, Incorporated submitted a request to re-register their source as required under 326 IAC 2-5.5-2 and to request that the permit be modified to require quarterly fuel use record keeping instead of daily.

The proposed source consists of one (1) corrugated sheet manufacturing operation consisting of the following emission units:

- (a) One (1) 20 MMBtu/hr natural gas fired boiler, with emissions exhausted through Stack S-1, and
- (b) Twenty (20) 0.6 MMBtu/hr natural gas fired space heaters.

Upon review of the request and the respective applicable requirements, it is determined that the source shall be issued a new registration to satisfy the requirements of 326 IAC 2-5.5-2(b).

Upon review of 40 CFR 60, Subpart Dc, Section 60.48c(g), it is determined that the owner or operator is required to record and maintain "daily" records of the amount of fuel combusted. The Office of Air Quality does not have the direct authority to relax these requirements.

However, an EPA memo from John Rasnic to Jewell Harper dated February 20, 1992 stated that "the amount of natural gas or low sulfur distillate oil which a plant combusts could be reported on a less frequent basis, for example a monthly basis." "Since the authority to approve alternative monitoring has not been delegated to the Regions, SSCD (Stationary Source Compliance Division) should be sent copies of any alternative monitoring provisions approved in accordance with this memo."

Therefore, no changes to the fuel use record keeping requirements shall be made at this time.

If Midwest Sheets desires to change the timing of the recording of the fuel combusted from daily recording to monthly recording, then the company needs to first send this request to the following address:

George Czerniak  
c/o United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)

77 West Jackson Boulevard  
Chicago, Illinois 60604-3590,

obtain the approval, and then resubmit the request to the Office of Air Quality along with the approval granted by the U.S. EPA.

### Existing Approvals

The source has been operating under Registration 159-9207-00016, issued on December 15, 1997.

### Enforcement Issue

IDEM is aware that the source did not submit an application to re-register the source as required under 326 IAC 2-5.5-2.

IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of this rule.

### Recommendation

The staff recommends to the Commissioner that the Registration be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

### Emission Calculations

The corrugated sheet manufacturing operation consists of the following emission units:

- (a) one (1) 20 MMBtu/hr natural gas fired boiler, with emissions exhausted through Stack S-1, and
- (b) twenty (20) 0.6 MMBtu/hr natural gas fired space heaters.

The following calculations determine the source UPTE and emissions after controls.

#### UPTE:

##### (a) Boiler:

The following calculations determine the boiler emissions based on a maximum design capacity of 20 MMBtu/hr, natural gas combustion, AP-42 emission factors, emissions before controls, and 8760 hours of operation.

$$\text{MMBtu/hr} * 8760 \text{ hr/yr} * 1/1000 \text{ MMcf/MMBtu} * \text{lb/MMcf} * 1/2000 \text{ ton/lb} = \text{ton/yr}$$

	PM	PM10	SO2	NOx	VOC	CO	Worst Case Single HAP	Combined HAP
Ef (lb/MMcf)	13.7	13.7	0.6	140.0	2.8	35.0	-	-
tons/yr	1.2	1.2	0.1	12.3	0.2	3.1	neg.	neg.



**(b) Space Heaters:**

The following calculations determine the space heater emissions based on a combined maximum design capacity of 12 MMBtu/hr, natural gas combustion, AP-42 emission factors, emissions before controls, and 8760 hours of operation.

$$\text{MMBtu/hr} * 8760 \text{ hr/yr} * 1/1000 \text{ MMcf/MMBtu} * \text{lb/MMcf} * 1/2000 \text{ ton/lb} = \text{ton/yr}$$

	PM	PM10	SO2	NOx	VOC	CO	Worst Case Single HAP	Combined HAP
Ef (lb/MMcf)	12.0	12.0	0.6	100.0	5.3	21.0	-	-
tons/yr	0.6	0.6	neg.	5.3	0.3	1.1	neg.	neg.

**Emissions After Controls:**

	PM	PM10	SO2	NOx	VOC	CO	Worst Case Single HAP	Combined HAP
Space Heaters	0.6	0.6	neg.	5.3	0.3	1.1	neg.	neg.
Boiler	1.2	1.2	0.1	12.3	0.2	3.1	neg.	neg.
<b>Total</b>	<b>1.8</b>	<b>1.8</b>	<b>0.1</b>	<b>17.6</b>	<b>0.5</b>	<b>4.2</b>	<b>neg.</b>	<b>neg.</b>

**Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the proposed changes based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.8
PM-10	1.8
SO <sub>2</sub>	0.1
VOC	0.5
CO	4.2
NO <sub>x</sub>	17.6

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Worst Case Single HAP	neg.

Combined HAPs	neg.
---------------	------

This source shall be issued a new registration because 326 IAC 2-5.5-2 requires re-registration and the unrestricted NO<sub>x</sub> emissions are still within the registration applicable range of 10 - 25 tons/yr.

### County Attainment Status

The source is located in Tipton County.

Pollutant	Status
PM <sub>10</sub>	attainment or unclassifiable
SO <sub>2</sub>	attainment or unclassifiable
NO <sub>2</sub>	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Tipton County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.
- (b) Tipton County has also been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### New Source Status

New Source Emissions (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	1.8	1.8	0.1	17.6	0.5	4.2	<10	<25

  

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	10/25

- (a) This new source is not a major PSD stationary source because no source criteria pollutant emissions are less than the major source level of 250 tons per year.

- (b) This new source is not a Part 70 major source because no criteria pollutant emissions exceed the applicable level of 100 tons/yr and the worst case single and combined HAP emissions are less than their respective applicable levels of 10 and 25 tons/yr.

### **Federal Rule Applicability**

#### **(a) New Source Performance Standards (NSPS)**

##### **40 CFR 60, Subpart Dc:**

The 20 MMBtu/hr natural gas fired boiler is subject to 40 CFR 60, Subpart Dc because the maximum heat capacity is greater than the applicable level of 10 tons per year and the boiler was constructed after the applicable date of June 9, 1989.

There are no emission limitations specified under this rule for a natural gas fired boiler.

However, the boiler is subject to the record keeping and reporting requirements specified under 40 CFR 60.48(g) which requires the owner or operator of each affected facility to record and maintain records of the amounts of each fuel combusted during each day.

#### **(b) National Emission Standards for Hazardous Air Pollutants (NESHAP):**

There are no NESHAPs that apply to the units and processes of this source.

### **State Rule Applicability - Entire Source**

#### **(1) 326 IAC 2-2 (Prevention of Significant Deterioration):**

This source is still not considered a PSD major source because the source is not one of the 28 listed source categories and does not have any criteria pollutant emissions that exceed the applicable major source level of 250 tons/yr.

#### **(2) 326 IAC 2-4.1 (HAPs Major Sources):**

326 IAC 2-4.1 still does not apply because the single and combined HAP emissions are less than the applicable levels of 10 and 25 tons per year, respectively.

#### **(3) 326 IAC 2-6 (Emission Reporting):**

This source is still not subject to 326 IAC 2-6 (Emission Reporting), because no pollutant emissions exceed the Tipton County applicable emission levels.

#### **(4) 326 IAC 5-1 (Opacity Limitations):**

The source is still subject to the requirements of 326 IAC 5.

### **State Rule Applicability - Individual Facilities**

#### **326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating):**

The 20 MMBtu/hr natural gas fired boiler is subject to 326 IAC 6-2. Pursuant to 326 IAC 6-2-4, the particulate matter (PM) emissions from the boiler shall be limited to 0.50 lb/MMBtu.

$$Pt = 1.09/Q^{0.26}$$

where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.  
Q = Total source maximum operating capacity rating in million Btu/hr (MMBtu/hr) heat input.

$$0.50 \text{ lb/MMBtu} * 20 \text{ MMBtu/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = 43.80 \text{ tons/yr}$$

The estimated PM emissions (0.1 ton/yr) are less than the 326 IAC 6-2-4 allowable emission rate of 43.80 tons/yr. Therefore, compliance is determined to be achieved.

### **Conclusion**

The owner or operator shall operate the equipment of this source according to the requirements established in Registration 159-16831-00016.